



An EDISON INTERNATIONAL® Company

June 23<sup>rd</sup>, 2014

San Onofre Nuclear Generation Station (SONGS)  
5000 Pacific Coast Highway  
P.O. Box 128  
San Clemente, CA. 92672

Texas LLRWD  
Compact Commission  
333 Guadalupe St. #3-240  
Austin, TX 78701

Subject: **Application For Importation of Nonparty Low Level Radioactive Waste**

Dear Commissioners,

Southern California Edison, San Onofre Nuclear Generation Station (S.O.N.G.S.) hereby provides submittal of Application For Importation of Nonparty Low Level Radioactive Waste to the Texas Low-Level Radioactive Waste Disposal Compact Commission. The Application, Annex A, Figure: 31 TAC §675.23(f)(1) is included with this letter. In accordance with 31 TAC §675.23 (h)(2), a copy of the application will be forwarded electronically and mailed to Texas Commission on Environmental Quality, Compact Facility Operator- Waste Control Specialists LLC, and Texas Low Level Radioactive Waste Disposal Compact Commission.

If there are any concerns or resolutions needed please feel free to contact the SONGS Radioactive Shipping and Receiving Department office at (949) 368-4345, or I can be reached at the following phone numbers below.

Sincerely,

A handwritten signature in cursive script that reads "Shawn P. Collins".

Shawn P. Collins  
Radioactive Waste/Shipping  
RMS/Instrumentation  
Technical Specialist  
Mail Stop: Building T-20  
(949) 368-4332 Office  
(949) 533-6201 Cell  
(760) 845-6033 Cell  
[shawn.collins@sce.com](mailto:shawn.collins@sce.com)

ANNEX A

TEXAS LOW-LEVEL RADIOACTIVE WASTE DISPOSAL  
COMPACT COMMISSION

APPLICATION FOR IMPORTATION OF NONPARTY LOW-LEVEL RADIOACTIVE WASTE

(NOTE: PURSUANT TO TEXAS HEALTH AND SAFETY CODE, §401.207(j), THIS APPLICATION MUST BE COMPLETED BY APPROPRIATE REPRESENTATIVES OF THE DEPARTMENT OF DEFENSE OR THE GENERATOR OF THE WASTE UNLESS THE GENERATOR IS A SMALL GENERATOR AS DEFINED IN 31 TAC §675.23(o), IN WHICH CASE THE APPLICATION MAY BE SUBMITTED BY AN APPROPRIATELY LICENSED BROKER)

1. Applicant Information:

Entity Name	<u>San Onofre Nuclear Generating Station (SONGS)</u>
Contact Person	<u>Shawn P. Collins</u>
Phone	<u>(949) 368-4345 or (949) 368-4332</u>
Email	<u>shawn.collins@sce.com</u>
Website address	<u>www.sce.com</u>
Business Address	<u>5000 Pacific Coast Highway</u>
	<u>San Clemente, Ca 92672</u>
Mailing Address	<u>5000 Pacific Coast Highway,</u>
	<u>San Clemente, Ca 92672</u>
	<u>Mail Stop: Building T-20</u>

- Is Applicant:
- Generator
  - A Broker who is a:
    - Licensed Waste Processor
    - Licensed Waste Collector
  - Department of Defense

Notes:

- (1) An appropriately licensed Broker may act on behalf of a Small Generator only if each such generator is identified and written authorization from each such generator is provided as an attachment hereto.
- (2) While Department of Defense Regulation 4715.6-R designates the Department of the Army as Executive Agent for disposal of low-level radioactive waste, the Commission will require that any agreement that it enters into in this regard be signed by both the Department of the Army as Executive Agent and the branch of the military that has generated the waste.

**Generator Type:**     Industrial  
                           Academic/Research  
                           Medical  
                           Utility  
                           Government

Is Applicant the entity responsible for the waste shipment?  yes  no

If no, please include the name and contact information for the entity responsible for the waste shipment.

Is Waste from a "Small Generator"?  yes  no

2. Term/Duration from Date of Approval: August 14, 2014 – August 31, 2015

3. Waste proposed for importation.

Waste Volume (Cubic Feet) 1,850

Waste Radioactivity in Curies 3.14E+03

Place of origination (State) of waste: San Onofre Nuclear Generating Station, California

Waste description: Nuclear power plant, reactor water decontamination resins, and media. Dry Active Waste consisting of wood, paper, plastic, rubber, metal, and Surface Contaminated Objects.

Waste classification (Class A, Class B, or Class C): Class B and C Waste

Waste form:  stable  unstable

Does waste contain any of the following radionuclides, check box(s) and complete blank(s):

C-14 4.91E+04 millicuries (mCi)

Tc-99 9.89E+04 microcuries (uCi)

I-129 9.60E+10 nanocuries (nCi)

Depleted Uranium \_\_\_\_\_ microcuries (uCi)

Concentration \_\_\_\_\_ (provide units)

Source of generation

Nuclear power plant , reactor water decontamination resins and media. Dry Active Waste generated from plant maintenance, past refuel outage activities, consisting of wood, paper, plastic, rubber, metal, and surface contaminated objects.

4. Is the proposed waste a sealed source?

No.                       Yes. Please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. Does Broker and/or Generator(s) have any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s) with the Texas Low-Level Radioactive Waste Disposal Compact Commission?

No                       Yes. Please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. Does Broker and/or Generator(s) have any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s) pending with any other regulatory agency with jurisdiction to regulate radioactive material including, without limitation, the Texas Commission on Environmental Quality (TCEQ)?

No                       Yes. Please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. **Certifications.** Applicant hereby certifies the following.

- a.            The information provided herein is complete, accurate and correct.
- b.            The low-level radioactive waste for which this Application is submitted will be packaged and shipped in accordance with applicable state and federal regulations and is acceptable for disposal at the Compact Facility.

- c. The person submitting this Application is authorized by Applicant to commit Applicant to each and every obligation and condition set forth herein and in the Agreement for Importation of Nonparty Compact Waste. A copy of a written document containing such authorization must be attached to this Application.
- d. Applicant has delivered to the Compact Facility operator and TCEQ a copy of this Application and the Agreement for Importation of Nonparty Compact Waste (along with any supplements or amendment thereto).

8. **Authorized Signatory:**

Shawn P. Collins  
*Print or type name*

*Shawn P. Collins*  
*Signature*

Radiation Protection Technical Specialist-Supervisor  
*Title*

June 23, 2014 / 6.23.2014  
*Date*

**ATTACHMENTS:**

(Attachments should include all applicable licenses, authorizations, and other materials needed or useful to fully explain the application.)

**ANNEX B**

**TERM SHEET**

(Minimum terms that must be addressed in any Waste Importation Agreement offered to the Texas Low-Level Radioactive Waste Disposal Compact Commission in connection with an Application to Import Waste).

- A. The proposed beginning and ending dates.
- B. Compliance with all applicable federal and state laws and rules including, without limitation, Texas Health and Safety Code (THSC), Chapter 403, §8.03.
- C. Liability for applicants' own acts, omissions, conduct, and relationships in accordance with applicable law.
- D. Acknowledgment that the Commission under any circumstances may amend or revoke the agreement with prior notice and that under emergency circumstances the Commission may suspend authorization to import with such notice as it is able to give under the circumstances.
- E. Agreement shall not be assignable or transferable to any other person.
- F. Agreement is subject to receipt by the Compact Facility Operator and the Commission of written certification from the Texas Commission on Environmental Quality (TCEQ) prior to the acceptance of Generator's Nonparty Compact Waste that the waste to be imported is authorized for disposal under the Compact Facility license.
- G. A description of the characteristics of the waste proposed for importation including (but not limited to) volume, type, physical form, total radioactivity, and radionuclide-specific activities.
- H. A representation by the applicant that it has disclosed:
  - (1) The existence of unresolved violations pending against the applicant with any other regulatory agency with jurisdiction to regulate radioactive material.
  - (2) The existence of any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s) that the applicant has with the Commission.
  - (3) The existence of any unresolved violation(s), complaint(s), unpaid fee(s), or past due reports that the applicant has with any other regulatory body, including, without limitation, the TCEQ.
- I. An acknowledgement that a misrepresentation with respect to an item listed in H may result in the cancellation of the agreement.

- J. The obligation to report immediately to the Commission any allegation of the violation of any law, rule or regulation related to the storage, shipment or treatment of any form of radioactive material.
- K. A provision acknowledging the right of the Commission to audit or cause to be audited compliance with the agreement.
- L. Agreement to comply to the extent applicable with the rules related to commingling adopted by the TCEQ in coordination with the Commission pursuant to THSC, §401.207(k).
- M. An affirmation that no waste of international origin shall ever be included in the materials to be imported to the Compact facility.
- N. Any other matter required by 31 TAC §675.23 to be included in the agreement.